

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

---

In re:

The Diocese of Rochester,

Debtor.

Case No. 19-20905

Chapter 11

---

**JOINT STATUS REPORT OF THE DIOCESE OF  
ROCHESTER AND THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS REGARDING THE PLAN AND DISCLOSURE STATEMENT**

1. The Diocese of Rochester (the “Diocese”) and the Official Committee of Unsecured Creditors (the “Committee”) previously filed a *Joint Plan of Reorganization for the Diocese of Rochester dated March 24, 2023* [Docket No. 2047] (the “Plan”). Additionally, the Diocese previously filed a *Disclosure Statement in Support of Joint Plan of Reorganization for the Diocese of Rochester dated March 24, 2023* [Docket No. 2046] (the “Disclosure Statement”).<sup>1</sup>

2. Through this status report (“Status Report”), the Diocese and Committee are providing an update to the Court and all parties-in-interest in this chapter 11 case (the “Chapter 11 Case”) as to the status of negotiations with various Non-Settling Insurers regarding the potential of settlement and proceeding on a consensual basis with the confirmation of the previously filed Plan.

3. As memorialized in the Plan, the Diocese and Committee entered into a settlement, subject to Court approval, wherein a Trust would be funded for the benefit of Abuse Claimants. At the time the Plan was filed, funding for the Trust consisted of (a) \$55 million from Participating Parties, including the Diocese, its Parishes, and other Catholic entities, and (b) \$20.6 million from LMI and Underwriters.

---

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Disclosure Statement.

4. The Diocese and Committee have been working diligently with the assistance of the Mediators to negotiate settlements with all of the Diocese's remaining insurers. The Diocese and Committee are pleased to inform the Court that they have negotiated settlements with (a) Interstate in the amount of \$50 million and (b) another insurer in the amount of \$750,000. Thus, the total the total settlements negotiated for the benefit of survivors of childhood sexual assault in the Diocese of Rochester is \$126.35 million.<sup>2</sup> At this time, the Diocese and Committee have been unable to reach a settlement with CNA, which is the only insurer that has not agreed to a settlement in this Case. The Diocese and the Committee believe that CNA has the highest exposure of any insurer on account of Abuse Claims asserted against the Diocese.

5. The Diocese and Committee will cause an amended Plan (the "Amended Plan") and amended Disclosure Statement (the "Amended Disclosure Statement") to be filed with the Court on or before September 13, 2023. The Diocese and the Committee request that the Court set a hearing on the Amended Disclosure Statement no less than 45 days after the Amended Plan and Amended Disclosure Statement have been filed. The Diocese and Committee will work together with the other parties-in-interest to prepare a scheduling order concerning the hearings on the Amended Disclosure Statement and Amended Plan. Once this scheduling order is agreed to, the Diocese and Committee will file it with the Court.

---

<sup>2</sup> All settlement agreements with insurers are subject to final documentation.

Dated: July 21, 2023

BOND, SCHOENECK & KING, PLLC

By: /s/ Stephen A. Donato

Stephen A. Donato  
Charles J. Sullivan  
Grayson T. Walter  
One Lincoln Center  
Syracuse, NY 13202  
Telephone: (315) 218-8000  
Email: sdonato@bsk.com  
csullivan@bsk.com  
gwalter@bsk.com

*Attorneys for The Diocese of Rochester*

BLANK ROME LLP

By: /s/ James R. Murray

James R. Murray  
James Carter  
1825 Eye Street NW  
Washington, DC 20006  
Telephone: (202) 420-3409  
Email: jim.murray@blankrome.com  
james.carter@blankrome.com

*Attorneys for The Diocese of Rochester*

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ Ilan D. Scharf

James I. Stang  
Ilan D. Scharf  
780 Third Avenue, 34th Floor  
New York, NY 10017  
Telephone: (212) 561-7700  
Email: jstang@pszjlaw.com  
ischarf@pszjlaw.com

*Counsel to the Official Committee of Unsecured Creditors*

BURNS BAIR LLP

By: /s/ Timothy W. Burns

Timothy W. Burns  
Jesse J. Bair  
10 E. Doty St., Suite 600  
Madison, Wisconsin 53703  
Telephone: 608-286-2808  
Email: tburns@burnsbair.com  
jbair@burnsbair.com

*Counsel to the Official Committee of Unsecured Creditors*